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*Attorneys for Defendants Comerica Bank
Conduent State & Local Solutions, Inc.,
and Conduent Business Services, LLC*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DAVID J. MOSCATO, *on behalf of himself
and all others similarly situated,*

Plaintiffs,

v.

COMERICA BANK, CONDUENT STATE
& LOCAL SOLUTIONS, INC. and
CONDUENT BUSINESS SERVICES,
LLC,

Defendants.

CASE NO. 2:23-cv-00993-JAD-DJA

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
VERIFIED PETITIONS FOR
ADMISSION PRO HAC VICE**

The current deadline for non-resident counsel for Defendants Comerica Bank, Conduent State & Local Solutions, Inc., and Conduent Business Services, LLC (collectively, "Defendants") to file their Verified Petitions for Admission to Practice Pro

1 Hac Vice is September 20, 2023. Defendants, by and through their counsel of record,
2 respectfully request that this Court extend the time for filing the verified petitions to
3 October 18, 2023. In support thereof, Defendants state as follows:

4 Defendants are represented in this action by Madeleine Coles, an attorney who
5 is an active member in good standing of the State Bar of Nevada.

6 Defendants are also represented by John C. Grugan, Jenny N. Perkins, and
7 Mitchell Turbenson, who are not members of the State Bar of Nevada, but who intend
8 to request admission as counsel pro hac vice pursuant to LR IA 11-2. Defendants'
9 aforementioned counsel have acted diligently in preparing their respective Verified
10 Petitions for Admission to Practice Pro Hac. They immediately requested Certificates
11 of Good Standing from all of the state bars that they are admitted to practice law. As
12 of the filing of this Motion, Defendants' aforementioned counsel have not yet received
13 the requested Certificates of Good Standing as outlined below.

14 Mr. Grugan's verified petition has been prepared, and the only requirement
15 that is needed is the Certificates of Good Standing of Mr. Grugan from the State Bar
16 of Pennsylvania and the State Bar of New Jersey, which are required to be attached to
17 his petition, pursuant to LR IA 11-2(b)(3). The Certificates of Good Standing have
18 been requested, but have not yet been received.

19 Ms. Perkins' verified petition has been prepared, and the only requirement that
20 is needed is the Certificates of Good standing of Ms. Perkins from the State Bar of
21 Pennsylvania and the State Bar of New Jersey, which are required to be attached to
22 her petition, pursuant to LR IA 11-2(b)(3). The Certificates of Good Standing have
23 been requested, but have not yet been received. Ms. Perkins is in receipt of her
24 Certificate of Good Standing from the State Bar of Florida and intends to attach it to
25 her verified petition upon receipt of the other two Certificates of Good Standing she
26 has requested.

27 Mr. Turbenson's verified petition has been prepared, and the only requirement
28 that is needed is the Certificates of Good Standing of Mr. Turbenson from the State

Bar of Arizona and the State Bar of California, which are required to be attached to his petition, pursuant to LR IA 11-2(b)(3). The Certificates of Good Standing have been requested, but have not yet been received.

As a result, Defendants, through counsel, request that this Court extend the deadline to file the verified petitions by thirty days. This is the first request for such an extension, and it is made in good faith and not for purposes of delay. Defendants have conferred with Plaintiff who does not oppose the requested relief herein.

Dated: September 20, 2023

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By: /s/ Madeleine Coles
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ORDER

IT IS SO ORDERED:


 UNITED STATES MAGISTRATE JUDGE

DATED: September 21, 2023

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